

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

MAY - 7 2019

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

ANTHONY FOY, AKA "DUKE",
JEREL SEAHORN, AKA "L",
RONALD BOWSER
GERALD KYLER, AKA "DAVE"
TEISHA PRIMM, AND
ANDREW PARKER,

Defendant.

Criminal No.

1:19 cr 31-TSK

Violations:

18 U.S.C. § 2
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
21 U.S.C. § 860

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

From in or about the Fall of 2017, to on or about the return of this Indictment, in Monongalia County, in the Northern District of West Virginia, and elsewhere, defendants **ANTHONY FOY, aka "DUKE," JEREL SEAHORN, aka "L," RONALD BOWSER, GERALD KYLER, aka "DAVE," TEISHA PRIMM, ANDREW PARKER,** and others, did unlawfully, knowingly, and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute heroin, a Schedule I narcotic controlled substance and cocaine base, also known as "crack," a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 846, and 841(b)(1)(C).

COUNT TWO

(Distribution of Heroin)

On or about August 18, 2015, in Monongalia County, in the Northern District of West Virginia, defendant **JEREL SEAHORN, aka “L,”** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$150.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

(Aiding and Abetting Distribution of Heroin)

On or about October 3, 2017, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY FOY, aka “DUKE,” and RONALD BOWSER**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

(Distribution of Heroin)

On or about March 29, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **JEREL SEAHORN, aka “L,”** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Aiding and Abetting Distribution of Cocaine Base)

On or about April 3, 2018, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY FOY, aka “DUKE,” and ANDREW PARKER**, aided and abetted by each other, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18 United States Code, Section 2.

COUNT SIX

(Aiding and Abetting Distribution of Heroin)

On or about April 24, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **ANDREW PARKER**, aided and abetted by another individual unknown to the Grand Jury, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$60.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Distribution of Heroin)

On or about May 3, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **JEREL SEAHORN, aka “L,”** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Aiding and Abetting Distribution of Heroin)

On or about May 14, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **JEREL SEAHORN, aka “L,”** aided and abetted by another individual unknown to the Grand Jury, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE

(Distribution of Heroin in Proximity to a Protected Location)

On or about June 15, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY FOY, aka “DUKE,”** did unlawfully, knowingly, intentionally and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TEN

(Distribution of Cocaine Base in Proximity to a Protected Location)

On or about June 15, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY FOY, aka “DUKE,”** did unlawfully, knowingly, intentionally and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT ELEVEN

(Aiding and Abetting Distribution of Heroin in Proximity to a Protected Location)

On or about June 21, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **GERALD KYLER, aka “DAVE,”** aided and abetted by another individual unknown to the Grand Jury, did unlawfully, knowingly, intentionally, and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860, and Title 18, United States Code, Section 2.

COUNT TWELVE

(Distribution of Heroin in Proximity to a Protected Location)

On or about June 29, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **GERALD KYLER, aka “DAVE,”** did unlawfully, knowingly, intentionally and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTEEN

(Aiding and Abetting Distribution of Heroin in Proximity to a Protected Location)

On or about July 12, 2018, in Monongalia County, in the Northern District of West Virginia, defendants **GERALD KYLER, aka “DAVE,” and TEISHA PRIMM**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$60.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860, and Title 18, United States Code, Section 2.

COUNT FOURTEEN

(Aiding and Abetting Distribution of Heroin in Proximity to a Protected Location)

On or about July 18, 2018, in Monongalia County, in the Northern District of West Virginia, defendants **GERALD KYLER, aka “DAVE,”** and **RONNIE BOWSER**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860, and Title 18, United States Code, Section 2.

COUNT FIFTEEN

(Distribution of Heroin in Proximity to a Protected Location)

On or about July 19, 2018, in Monongalia County, in the Northern District of West Virginia, defendant **GERALD KYLER, aka “DAVE,”** did unlawfully, knowingly, intentionally and without authority distribute within 1000 feet of the real property comprising West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

A true bill,

/s/ _____
Grand Jury Foreperson

/s/ William J. Powell
WILLIAM J. POWELL
UNITED STATES ATTORNEY

Zelda E. Wesley
Assistant United States Attorney